Department of Veterans Affairs
Medical & Regional Office Center
Kennebec County
Augusta, Maine
A-372-71-P-A (SM)

Departmental
Findings of Fact and Order
Air Emission License
Amendment #1
After-the-Fact

FINDINGS OF FACT

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

The Department of Veterans Affairs Medical & Regional Office Center (DVA) was issued Air Emission License A-372-71-O-R/A on April 25, 2011, permitting the operation of emission sources associated with their medical and regional office center.

DVA has requested an amendment to their license in order to add one new emergency generator, two ethylene oxide (EO) sterilization units and a parts washer to the license, all being after-the-fact. Also included within this amendment is the correction of the name of existing Generator #3. Existing Generator #3 was renamed to Generator #8 when installed in 2004. In addition, the amendment includes setting the maximum allowable operation of each emergency generator at the facility to 500 hours per year.

The equipment addressed in this license is located at #1 VA Center in Augusta, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Generators

Equipment	Power Output (KW)	Max. Capacity (MMBtu/hr)	Firing Rate (gal/hr)	Fuel Type, % sulfur	Date of Construction	Stack
Generator #8 *	500	4.67	36.3	Diesel, 0.0015%	2004	G8
Generator #9	250	2.44	17.8	Diesel, 0.0015%	2010	G9

* Generator #8 was previously named Generator #3 in license A-372-71-O-R/A (dated April 25, 2011). The unit remains the same except for its designated name and stack name.

In addition, the facility utilizes two ethylene oxide (EO) sterilizer units and a parts washer. The EO sterilizer units are each 4.74 cubic feet and emissions exhaust to and are controlled by an EO abator device. The parts washer has a ten (10) gallon capacity and uses #2 fuel oil as a solvent.

C. Application Classification

The modification of a minor source is considered a major or minor modification based on whether or not expected emission increases exceed the "Significant Emission Levels" as defined in the Department's regulations. The emission increases are determined by subtracting the current licensed emissions preceding the modification from the maximum future licensed allowed emissions, as follows:

Pollutant	Current License (TPY)	Future License (TPY)	Net Change (TPY)	Sig. Level
PM	15.9	16.0	+ 0.1	100
PM_{10}	15.9	16.0	+ 0.1	100
SO_2	75.0	75.0	0.0	100
NO_x	95.5	98.7	+ 3.2	100
CO	47.0	47.7	+ 0.7	100
VOC	4.3	4.5	+ 0.2	50

This modification is determined to be a minor modification and has been processed as such.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). Separate

control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Amendment Description

In the last renewal, air emission license A-372-71-O-R/A (dated April 25, 2011), the name designation of Generator #3 was incorrect. At the installation of the generator in 2004, the facility designated the unit Generator #8. Henceforth, the unit shall be known as Generator #8.

DVA currently has in operation one generator that was not licensed in air emission license A-372-71-O-R/A, designated Generator #9. Generator #9 was installed to replace existing Generator #2, which is no longer in service nor at the site.

Previously, in license A-372-71-O-R/A, DVA had to comply with conditions that set multiple generators limited to a combined 500 hours per year. With the removal of existing generators and the addition of a new unit, the maximum allowable operation time for each generator at the facility is reset to 500 hours per year.

DVA also operates two ethylene oxide (EO) sterilizer units and a 10 gallon capacity parts washer that were not previously licensed.

C. Emergency Generator #9

DVA operates one new emergency generator, designated Generator #9. The emergency generator was installed to replace existing Generator #2, which has since been removed from the facility. Generator #9 is rated at 250 kW (2.44 MMBtu/hr power input) and fires diesel fuel. Generator #9 was installed and began operating in 2010.

1. BACT Findings

The BACT emission limits for the generator are based on the following:

Diesel

PM/PM_{10} –	0.12 lb/MMBtu based on 06-096 CMR 103
SO_2 –	0.0015 lb/MMBtu based on firing 0.0015% sulfur
NOx –	4.41 lb/MMBtu from AP-42, Table 3.3-1 (dated 10/96)
CO –	0.95 lb/MMBtu, AP-42, Table 3.3-1 (dated 10/96)
VOC –	0.36 lb/MMBtu, AP-42, Table 3.3-1 (dated 10/96)
Opacity –	06-096 CMR 101

The BACT emission limits for the generator are the following:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Generator #9	0.29	0.29	0.01	10.76	2.32	0.85

Visible emissions from Generator #9 shall not exceed 20% opacity on a 6-minute block average, except for no more than two (2) six (6) minute block averages in a 3-hour period.

The emergency generator shall be limited to 500 hours of operation a year, based on a 12-month rolling total. DVA shall keep records of the hours of operation for the unit.

2. 40 CFR Part 60, Subpart IIII

The federal regulation 40 CFR Part 60, Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE)* is applicable to the emergency generator listed above since the unit was ordered after July 11, 2005 and manufactured after April 1, 2006. By meeting the requirements of Subpart IIII, the unit also meets the requirements found in the *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, 40 CFR Part 63, Subpart ZZZZ.

a. Emergency Definition:
Emergency stationary ICE means any stationary reciprocating internal combustion engine that meets all of the following criteria:

(1) The stationary ICE is operated to provide electrical power or mechanical work during an emergency situation. Examples include stationary ICE used to produce power for critical networks or

equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary ICE used to pump water in the case of fire or flood, etc.

(2) Paragraph (1) above notwithstanding, the emergency stationary ICE may be operated for any combination of the purposes specified below for a maximum of 100 hours per calendar year:

(i) Maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.

(ii) Emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(iii) Periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(3) Paragraphs (1) and (2) above notwithstanding, emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. These 50 hours are counted as part of the 100 hours per calendar year for maintenance checks and readiness testing, emergency demand response, and periods of voltage deviation or low frequency, as provided in paragraph (2) above.

The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity, except if the following conditions are met:

(i) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.

(ii) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

(iii) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

(iv) The power is provided only to the facility itself or to support the local transmission and distribution system.

(v) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

[40 CFR §60.4211(f) and §60.4219]

b. 40 CFR Part 60, Subpart IIII Requirements:

(1) Manufacturer Certification Requirement
Generator #9 shall be certified by the manufacturer as meeting the emission standards for new nonroad compression ignition engines found in 40 CFR §60.4202. [40 CFR §60.4205(b)]

(2) Ultra-Low Sulfur Diesel Requirement
The diesel fuel fired in Generator #9 shall not exceed 15 ppm sulfur (0.0015% sulfur), except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted. [40 CFR §60.4207(b)]

(3) Non-Resettable Hour Meter Requirement
A non-resettable hour meter shall be installed and operated on the generator. [40 CFR §60.4209(a)]

(4) Operations and Maintenance Requirements
Generator #9 shall be operated and maintained according to the manufacturer's emission-related written instructions or procedures developed by DVA that are approved by the engine manufacturer. DVA may only change those emission-related settings that are permitted by the manufacturer. [40 CFR §60.4211(a)]

(5) Annual Time Limit for Maintenance and Testing
Generator #9 shall be limited to 100 hours/year for maintenance checks and readiness testing, emergency demand response, and periods of voltage or frequency deviation from standards. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity unless the conditions in §60.4211(f)(3)(i) are met). [40 CFR §60.4211(f)]

(6) Initial Notification Requirement
No initial notification is required for the emergency engine. [40 CFR §60.4214(b)]

(7) Annual Reporting Requirements for Demand Response Availability Over 15 Hours per Year (for generators greater than 100 brake hp)
If Generator #9 operates or is contractually obligated to be available for more than 15 hours per calendar year in a demand response program, during a period of deviation from standard voltage or frequency, or supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in §60.4211(f)(3)(i), DVA shall submit an annual report containing the information in §60.4214(d)(1)(i) through (vii). The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year. The annual report must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form is not available in CEDRI at the time that the report is due, the written report must be submitted to the following address:

Director, Office of Ecosystem Protection
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, MA 02109-3912

[40 CFR §60.4214(d)]

D. Ethylene Oxide (EO) Sterilizers

DVA operates two, Steris Amsco Eagle, Model 3017, ethylene oxide (EO) sterilizer units, each with a size of 4.74 cubic feet. The EO units are used to

sterilizer medical equipment at the facility that is unable to withstand the high temperature and turbulence of conventional steam sterilization.

The two EO sterilizer units are each equipped with a Safe Cell II EO abator developed by Advanced Air Technologies, Inc. to destroy the ethylene oxide emissions. The control equipment utilizes a patented technology using a dry reactant media that causes a chemical reaction to safely destroy EO leaving no hazardous or toxic by-products.

Last year the facility purchased 124 cylinders (100 grams of ethylene oxide per cycliner), but only used 53 cylinders for a total of 11 pounds of ethylene oxide usage. One cylinder is used per cycle.

The EO sterilizer units are subject to 40 CFR Part 63, Subpart WWWWW, *National Emissions Standards for Hospital Ethylene Oxide Sterilizers*. According to the federal regulation, the EO units shall sterilize full loads of items having a common aeration time, except under medically necessary circumstances, as that term is defined in §63.10448. [40 CFR §63.10390]

Per 40 CFR §63.10400(c), DVA demonstrated initial compliance by submitting an Initial Notification of Compliance Status certifying that the facility was venting the ethylene oxide emissions from each sterilization unit to an add-on pollution control device. DVA certified that they were operating the control device during all sterilization processes and were in accordance with the manufacturer's recommended procedures.

E. Parts Washer

The Safety-Kleen parts washer has a design capacity of 10 gallons and was installed in the late 1990's. The parts washer is subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended) and records shall be kept documenting compliance.

F. Annual Emissions

1. Total Annual Emissions

DVA shall be restricted to the following annual emissions, based on a 12-month rolling total. The tons per year limits for Generator #9 were calculated based on a maximum operation of 500 hours per year for the emergency generator:

Total Licensed Annual Emissions for the Facility
Tons/year
(used to calculate the annual license fee)

	PM	PM_{10}	SO_2	NO_x	CO	VOC
Boilers 1, 2, 3	10.8	10.8	70.9	40.5	4.5	0.3
Boiler 4	4.7	4.7	3.9	39.0	39.0	2.7
Generator #1	0.05	0.05	0.02	1.77	0.38	0.14
Generator #4	0.19	0.19	0.08	6.84	1.47	0.54
Generator #5	0.04	0.04	0.02	1.37	0.30	0.11
Generator #7	0.04	0.04	0.02	1.32	0.29	0.11
Generator #8	0.14	0.14	0.06	5.15	1.11	0.41
Generator #9	0.07	0.07	0.01	2.69	0.58	0.21
Total TPY	**16.0**	**16.0**	**75.0**	**98.7**	**47.7**	**4.5**

2. Greenhouse Gases

Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans,* 40 CFR Part 52, Subpart A, §52.21 Prevention of Significant Deterioration of Air Quality rule. Greenhouse gases, as defined in 06-096 CMR 100 (as amended), are the aggregate group of the following gases: Carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO_2e).

Based on the facility's fuel use limit(s), the worst case emission factors from AP-42, IPCC (Intergovernmental Panel on Climate Change), and *Mandatory Greenhouse Gas Reporting*, 40 CFR Part 98, and the global warming potentials contained in 40 CFR Part 98, DVA is below the major source threshold of 100,000 tons of CO_2e per year. Therefore, no additional licensing requirements are needed to address GHG emissions at this time.

III. AMBIENT AIR QUALITY ANALYSIS

DVA previously submitted an ambient air quality impact analysis for air emission license A-372-71-O-R/A (dated April 25, 2011) demonstrating that emissions from the facility, in conjunction with all other sources, do not violate Ambient Air Quality Standards (AAQS). An additional air quality impact analysis is not required for this amendment.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-372-71-P-A subject to the conditions found in Air Emission License A-372-71-O-R/A, and in the following conditions.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

SPECIFIC CONDITIONS

All conditions and subparts of conditions not specifically addressed here shall remain in effect as licensed in A-372-71-O-R/A dated April 25, 2011 unless modified by a future licensing action.

Specific Condition (18) in air emission license A-372-71-O-R/A shall be replaced to read as follows:

(18) **Emergency Generators**

A. The generators are each limited to 500 hours per year total operation, based on a 12-month rolling total. Compliance shall be demonstrated by a written log of all generator operating hours. [06-096 CMR 115, BACT/BPT]

B. The diesel fuel oil sulfur content for the generators shall be limited to 0.0015% sulfur. Compliance shall be demonstrated by fuel records from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [06-096 CMR 115, BPT]

C. Emissions shall not exceed the following:

Unit	Pollutant	lb/MMBtu	Origin and Authority
Generator #4	PM	0.12	06-096 CMR 103(2)(B)(1)(a)
Generator #8	PM	0.12	06-096 CMR 103(2)(B)(1)(a)

D. Emissions shall not exceed the following [06-096 CMR 115, BACT/BPT]:

Unit	PM (lb/hr)	PM_{10} (lb/hr)	SO_2 (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Generator #1	0.19	0.19	0.08	7.06	1.52	0.56
Generator #4	0.74	0.74	0.32	27.34	5.89	2.17
Generator #5	0.16	0.16	0.07	5.73	1.24	0.46
Generator #7	0.14	0.14	0.06	5.29	1.14	0.42
Generator #8	0.55	0.55	0.24	20.59	4.44	1.63
Generator #9	0.29	0.29	0.01	10.76	2.32	0.85

E. Visible emissions from each of the diesel generators shall not exceed 20% opacity on a 6 minute block average, except for no more than two (2) six (6) minute block averages in a 3 hour period. [06-096 CMR 101]

F. Emergency Generators #1, #4, #5, #7 and #8 are only to be operated for maintenance purposes and for situations arising from sudden and reasonably unforeseeable events beyond the control of the source. Emergency generators are not to be used for prime power when reliable offsite power is available; nor to operate or to be contractually obligated to be available for more than 15 hours per calendar year in a demand response program, during a period of deviation from standard voltage or frequency, or supplying power during a non-emergency situation as part of a financial arrangement with another entity. [06-096 CMR 115, BPT]

G. Emergency Generator #9 shall meet the applicable requirements of 40 CFR Part 60, Subpart IIII, including the following:

1. Manufacturer Certification
   Generator #9 shall be certified by the manufacturer as meeting the emission standards for new nonroad compression ignition engines found in §60.4202. [40 CFR §60.4205(b)]

2. Ultra-Low Sulfur Diesel Fuel
   The diesel fuel fired in Generator #9 shall not exceed 15 ppm sulfur (0.0015% sulfur), except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted. Compliance with the fuel sulfur content limit shall be based on fuel records from the supplier documenting the type of fuel delivered and the sulfur content of the fuel. [40 CFR §60.4207(b) and 06-096 CMR 115]

3. Non-Resettable Hour Meter
   A non-resettable hour meter shall be installed and operated on Generator #9. [40 CFR §60.4209(a)]

4. Annual Time Limit for Maintenance and Testing
   Generator #9 shall be limited to 100 hours/year for maintenance checks and readiness testing, emergency demand response, and periods of voltage or frequency deviation from standards. Up to 50 hours/year of the 100 hours/year may be used in non-emergency situations (this does not include peak shaving, non-emergency demand response, or to generate income for a facility by providing power to an electric grid or otherwise supply power as part of a financial arrangement with another entity unless the conditions in §60.4211(f)(3)(i) are met). These limits are based on a calendar year. Compliance shall be demonstrated by a written log of all generator operating hours. [40 CFR §60.4211(f) and 06-096 CMR 115]

5. Operation and Maintenance
   Generator #9 shall be operated and maintained according to the manufacturer's emission-related written instructions or procedures developed by DVA that are approved by the engine manufacturer. DVA may only change those emission-related settings that are permitted by the manufacturer. [40 CFR §60.4211(a)]

6. Annual Reporting for Demand Response Availability Over 15 Hours per Year (for generators greater than 100 hp)
   If Generator #9 operates or is contractually obligated to be available for more than 15 hours per calendar year in a demand response program, during a period of deviation from standard voltage or frequency, or supplying power during a non-emergency situation as part of a financial arrangement with another entity as specified in §60.4211(f)(3)(i), the facility shall submit an annual report containing the information in §60.4214(d)(1)(i) through (vii). The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year. The annual report must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form is not available in CEDRI at the time that the report is due, the written report must be submitted to the following address [40 CFR §60.4214(d)]:

   Director, Office of Ecosystem Protection
   U.S. Environmental Protection Agency
   5 Post Office Square, Suite 100
   Boston, MA 02109-3912

The following are new conditions:

(22) **Ethylene Oxidize (EO) Sterilizers**

DVA shall operate the EO sterilizers in accordance with 40 CFR Part 63, Subpart WWWWW, including, but not limited to, operating the add-on pollution control for all sterilization processes in accordance with the manufacturer's recommended procedures and sterilizing full loads of items having a common aeration time, except under medically necessary circumstances (medically necessary defined in §63.10448 means circumstances that a hospital central services staff, a hospital administrator, or a physician concludes, based on generally accepted medical practices, necessitates sterilizing without a full load in order to protect human health) . [40 CFR Part 63, Subpart WWWWW]

(23) **Parts Washer**

Parts washers at DVA are subject to *Solvent Cleaners*, 06-096 CMR 130 (as amended).

A. DVA shall keep records of the amount of solvent added to each parts washer. [06-096 CMR 115, BPT]
B. The following are exempt from the requirements of 06-096 CMR 130 [06-096 CMR 130]:
   1. Solvent cleaners using less than two liters (68 oz) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20° C (68° F);
   2. Wipe cleaning; and,
   3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.
C. The following standards apply to cold cleaning machines that are applicable sources under Chapter 130.
   1. DVA shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 CMR 130]:
      (i) Waste solvent shall be collected and stored in closed containers.
      (ii) Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
      (iii) Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
      (iv) The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
      (v) Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the degreaser.

(vi) When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.

(vii) Spills during solvent transfer shall be cleaned immediately. Sorbent material used to clean spills shall then be immediately stored in covered containers.

(viii) Work area fans shall not blow across the opening of the degreaser unit.

(ix) The solvent level shall not exceed the fill line.

2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches. [06-096 CMR 130]

DONE AND DATED IN AUGUSTA, MAINE THIS 19 DAY OF July , 2013.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Cone for
PATRICIA W. AHO, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-372-71-O-R/A.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 3/22/2013
Date of application acceptance: 3/26/2013

Date filed with the Board of Environmental Protection:

This Order prepared by Allison M. Hazard and Kathleen E. Tarbuck, Bureau of Air Quality.